

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE FAIRLIFE MILK PRODUCTS
MARKETING AND SALES PRACTICES
LITIGATION**

MDL No. 2909

Master Case No. 19-cv-3924

Judge Robert M. Dow, Jr.

This Document Relates To:

ALL CASES

PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

Pursuant to Federal Rule of Civil Procedure 23(e)(2), Plaintiffs respectfully seek the Court's final approval of a \$21-million non-reversionary class action Settlement¹ to resolve the above-captioned multidistrict litigation. Under the Settlement, Claimants are eligible to receive up to \$20 for claims without Valid Proof of Purchase, and up to \$80 for claims with Valid Proof of Purchase, for a total of \$100 in possible relief, subject to *pro rata* increases or decreases depending on the number of claims filed. The Settlement also includes meaningful injunctive relief, and none of the \$21 million Settlement Fund will be used to fund the injunctive relief.

Plaintiffs believe that the Settlement is an excellent result for the Class, and that it provides fair, adequate, and reasonable relief to resolve this Litigation. They respectfully request that the Court enter the proposed Order granting final approval of the Settlement.

¹ All capitalized terms herein have the same meaning as defined in the Settlement Agreement (ECF No. 153-1).

Dated: July 21, 2022

Respectfully submitted,

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***Counsel for Plaintiffs and the Proposed
Settlement Class***

SIGNATURE ATTESTATION

Pursuant to the United States District Court for the Northern District of Illinois' General Order on Electronic Case Filing, General Order 16-0020(IX)(C)(2), I hereby certify that authorization for the filing of this document has been obtained from the signatories shown above and that each signatory concurs in the filing's content.

/s/ Amy E. Keller
Amy E. Keller

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed using this Court's CM/ECF service, which will send notification of such filing to all counsel of record this 21st day of July 2022.

/s/ Amy E. Keller
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